# UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3284-LTS

as representative of

PUERTO RICO SALES TAX FINANCING CORPORATION,

Debtor.

MOTION SUBMITTING TRANSLATION OF EXHIBIT ATTACHED TO THE DECLARATION OF TIMOTHY DONAHUE IN SUPPORT OF OBJECTION OF THE GMS GROUP, LLC TO TITLE III PLAN OF ADJUSTMENT OF PUERTO RICO SALES TAX FINANCING CORPORATION

## GODREAU & GONZALEZ LAW, LLC

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Attorneys for The GMS Group, LLC

Dated: January 7, 2019

The GMS Group, LLC ("GMS" or "Secured Creditor"), respectfully shows the Court as follows:

- On December 21, GMS filed an "Amended Objection Of The GMS Group, LLC
   To Second Amended Title III Plan Of Adjustment Of Puerto Rico Sales Tax Financing
   Corporation And Request For Evidentiary Hearing" with supporting exhibits (the "GMS Objection"). See, Docket 4564.
- 2. On December 28, 2018, Peter C. Hein filed the "Objection Of Individual COFINA Subordinate Bondholder Residing In The 50 States Who Purchased At The Original Offering Prices, To Confirmation Of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan, And Response And Opposition To COFINA's Thirteenth Omnibus Objection To Individual Claim No. 10701" (the "Hein Objection"). *See, Docket 4585*.
- 3. On December 31, 2018, GMS filed a joinder (the "GMS Joinder") to the Hein Objection. *See, Docket 4587*.
- 4. On December 31, 2018, Hein transmitted by FedEx a supplement to the Hein Objection (the "Hein Supplement"), which was uploaded to the Court's electronic docket on January 2, 2019. *See, Docket 4595*.

- 5. On January 2, 2019, GMS filed a joinder to the Hein Supplement (the "GMS Joinder to Hein Supplement"). *See, Docket 4605*.
- 6. On January 2, 2019, GMS filed declarations from Peter Hein and Timothy Donohue in support of the GMS Objection. *See, Docket 4606*.
  - 7. Certain of the Exhibits attached to the Declaration were in the Spanish Language.
- 8. GMS hereby submits the English translations of said Exhibits. (*See, attached Exhibit 1*).

Dated: New York, New York
January 7, 2019

#### GODREAU & GONZALEZ LAW, LLC

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